UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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PAUL T. PAPADAKIS,
                                            :
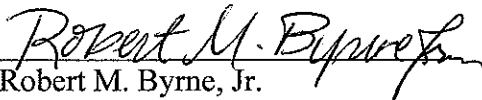   PLAINTIFF   CIVIL ACTION
                                            :   NO.: 04-30189-MAP
VS.
                                            :
CSX TRANSPORTATION,
                                            :
             DEFENDANT
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PLAINTIFF'S MOTION TO AMEND HIS WITNESS LIST

Now comes the Plaintiff and respectfully moves the Court for leave to amend his witness

list by adding as an additional witness, Ronald M. Paasch, MD. Dr. Paasch is associated with

Pioneer Spine and Sports Physicians, PC in West Springfield, Massachusetts. The Plaintiff began

treating with Dr. Paasch in August of 2006. His treatments have consisted of an initial

evaluation, physical therapy, injection therapy, and most recently, a discogram which was

performed on December 7, 2006. Copies of Dr. Paasch's medical records as well as the results of

the discogram have been provided to the Defendant as has a medical authorization authorizing

the Defendant to obtain these records directly from Dr. Paasch's office. If allowed to testify, Dr.

Paasch is expected to relate the results of his examination and the physical therapy and injection

treatments that he has administered. Dr. Paasch will also discuss the results of the discogram

performed by him at Mercy Medical Center on 271 Cruz Street in Springfield, Massachusetts.

Dr. Paasch is expected to testify that the results of the discogram confirm the existence of a torn

disc at the L4-5 level, which is consistent with the results of an MRI performed in July of 2001

and April of 2002.

The Plaintiff respectfully asks that he be permitted to supplement his witness list by

adding Dr. Paasch as a witness to testify concerning the above referenced matter.
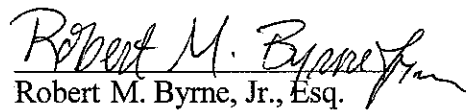
Robert M. Byrne, Jr.
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(617) 720-1333
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Certificate of Service

I hereby certify that on December 13, 2006, I served the foregoing Plaintiff's Motion to Amend His Witness List to:

Michael B. Flynn, Esq.
Flynn & Associates, PC
400 Crown Colony Drive, Suite 200
Quincy, MA 02169

Robert M. Byrne, Jr., Esq.